

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

IN RE: USA GYMNASTICS,¹
Debtor.

Chapter 11

Case No. 18-09108-RLM-11

**NOTICE OF DRAW RE: MONTHLY FEE STATEMENTS
OF MILLER JOHNSON AS SPECIAL COUNSEL TO THE DEBTOR IN POSSESSION,
FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES,
FROM JUNE 1, 2019 THROUGH JUNE 30, 2019
PURSUANT TO ORDER GRANTING DEBTOR'S MOTION
FOR ENTRY OF ORDER ESTABLISHING PROCEDURES FOR INTERIM
COMPENSATION AND REIMBURSEMENT OF PROFESSIONALS [DN 187]**

Notice is hereby given that Miller Johnson, Special Counsel to the Debtor In Possession, has filed its Consolidated Monthly Statements of Fees and Expenses for the Period From June 1, 2019 through June 30, 2019, with the Bankruptcy Court.

Notice is further given that said statements, which include total fees of \$97,578.00 and total expenses of \$8,249.77, are attached to hereto as **Exhibits A(1) – A(2)**.

If you have an objection to all or any portion of any of the above-referenced statements, you have fourteen (14) days from the date this notice is filed with the Court to serve a written Notice of Objection on Miller Johnson, Attn: John T. Piggins, P.O. Box 306, Grand Rapids, Michigan 49501-0306 and by email at pigginsj@millerjohnson.com. The Notice of Objection must set forth the precise nature of the objection and the amount at issue.

If no Notice of Objection is timely served on Miller Johnson, the Debtor shall promptly pay 80% of the fees and 100% of the expenses set out above, subject to final approval by the Court at a future hearing.

If a timely Notice of Objection is served regarding some but not all of the above-referenced fees and expenses, the Debtor shall promptly pay 80% of the fees and 100% of the expenses that are not the subject of a timely Notice of Objection, subject to final approval by the Court at a future hearing.

If you serve a Notice of Objection on Miller Johnson and you are unable to resolve your objection within fourteen (14) days after service, you may file your objection with the Court.

Upon filing an objection with the Court, a subsequent Notice will be sent to you with the date, time and location of the hearing on the objection.

¹ The last four digits of the Debtor's federal tax identification number are 7871. The location of the Debtor's principal office is 130 E. Washington Street, Suite 700, Indianapolis, Indiana 46204.

**A COPY OF ANY OBJECTION
FILED WITH THE COURT MUST ALSO BE SENT TO:**

Office of the United States Trustee
101 W Ohio St
Indianapolis, IN 46204

Miller Johnson
Attn: John T. Piggins
P.O. Box 306
Grand Rapids, MI 49501-0306

And by email to:
pigginsj@millerjohnson.com

Sexual Abuse Survivors Committee
c/o Meredith R. Theisen
Rubin & Levin, P.C.
135 N. Pennsylvania St., Suite 1400
Indianapolis, IN 46204

And by email to: mtheisen@rubin-levin.net

Date: July 17, 2019

USA Gymnastics
130 E. Washington Street
Suite 700
Indianapolis, IN 46204

Dean Panos, Esq.
Melissa M. Root, Esq.
Catherine L. Steege, Esq.
Jenner & Block LLP
353 N. Clark Street
Chicago, IL 60654

And by email to dpanos@jenner.com;
mroot@jenner.com; and
csteeg@jenner.com

Sexual Abuse Survivors Committee
c/o James I. Stang
Pachulski Stang Ziehl & Jones LLP
10100 Santa Monica Blvd.
Ste 1300
Los Angeles, CA 90067

And by email to: jstang@pszjlaw.com



John T. Piggins (Michigan Bar #P34495)
pigginsj@millerjohnson.com
P.O. Box 306
Grand Rapids, MI 49501-0306
(616) 831-1793

EXHIBIT A(1)

PO Box 306
Grand Rapids, Michigan 49501-0306
616.831.1700
TAX ID# 38-1603110

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USA Gymnastics
Accounts Payable
130 E Washington Street
Suite 700
Indianapolis, IN 46204

Re: Ropes & Gray and Other Investigations

For Legal Services Rendered through June 30, 2019

6/02/19	RLS	Work on short-term advice for medical records protocol	.70	245.00
6/03/19	JWC	Provide topic details of Indiana Attorney General productions	.40	60.00
6/03/19	ACC	Email to James W. Casteel regarding previous Indiana Attorney General production	.10	21.50
6/03/19	ACC	Review certain emails in previous Indiana Attorney General production now marked privileged by Epiq	.20	43.00
6/03/19	CMK	Review documents and correspondence for information needed by Rebecca L. Strauss and Jenner & Block for responding to new subpoena	1.50	292.50
6/03/19	CJS	Prepare for and participate in call with Kathryn Carson, David Rudd, and Stefanie Korepin regarding subpoena	.50	175.00
6/03/19	RLS	Work on collection of documents for response to subpoena	2.70	945.00
6/04/19	ACC	Telephone conference with James W. Casteel regarding previous productions to the Indiana attorney general	.30	64.50
6/04/19	ACC	Email to Christopher J. Schneider and Rebecca L. Strauss regarding redactions in previous productions	.20	43.00

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6/04/19	ACC	Email to Barnes & Thornburg regarding previous productions to the Indiana Attorney General	.20	43.00
6/04/19	ACC	Coordinate production regarding subpoena	.70	150.50
6/04/19	HAR	Update records regarding document production to Indiana Attorney General from May 2019	.40	78.00
6/04/19	RLS	Work on collection of documents in response to subpoena	4.20	1,470.00
6/05/19	ACC	Coordinate production in response to subpoena	1.30	279.50
6/05/19	ACC	Communications with James W. Casteel regarding clawback of documents from the Indiana Attorney General and previous productions to same	.60	129.00
6/05/19	RLS	Work on claw back of privileged produced documents	1.00	350.00
6/06/19	ACC	Telephone conference with Barnes & Thornburg and Rebecca L. Strauss, Amy E. Murphy and James W. Casteel regarding previous production to the Indiana Attorney General	.50	107.50
6/06/19	ACC	Prepare for telephone conference with Barnes & Thornburg and review metrics for previous productions to the Indiana attorney general	.70	150.50
6/06/19	ACC	Emails with James W. Casteel regarding metrics of documents produced to the Indiana attorney general	.20	43.00
6/06/19	ACC	Office conference with Amy E. Murphy	.30	64.50

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regarding previous productions to the
Indiana attorney general

6/06/19	RLS	Telephone conference with Barnes & Thornburg regarding claw back of privileged documents from the Indiana Attorney General	.50	175.00
6/07/19	ACC	Coordinate production of documents in response to subpoena	.80	172.00
6/10/19	RLS	Work on gathering documents in response to request for all documents produced to law enforcement agencies	1.20	420.00
6/10/19	RLS	Work with co-counsel to answer questions regarding response to subpoena	.20	70.00
6/11/19	RLS	Telephone conference with Christine Bowman regarding response to subpoena for documents	1.00	350.00
6/11/19	RLS	Telephone conference with Christopher J. Schneider regarding subpoena for documents and preparation for mediation	.50	175.00
6/12/19	JWC	Search for documents for Indiana Attorney General production in Relativity	.40	60.00
6/12/19	JWC	Perform conflict checks of documents for Indiana Attorney General production in Relativity	1.60	240.00
6/12/19	JWC	Prepare documents for Indiana Attorney General production in Relativity	.80	120.00
6/12/19	JWC	Send Indiana Attorney General production set for running in	.20	30.00

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		Relativity		
6/13/19	JWC	Download production USAG_INDAG_050	.40	60.00
6/13/19	JWC	Extract production USAG_INDAG_050	.20	30.00
6/13/19	JWC	Perform quality control checks of production USAG_INDAG_050	1.80	270.00
6/13/19	JWC	Prepare production USAG_INDAG_050 for delivery	.40	60.00
6/13/19	JWC	Send production USAG_INDAG_050 for delivery	.20	30.00
6/13/19	CJS	Telephone conference with Mark Stuaan regarding status of Indiana AG investigation and strategy	.30	105.00
6/13/19	RLS	Telephone conference with Christine Bowman, regarding past productions to law enforcement agencies	1.20	420.00
6/13/19	RLS	Work on analysis of past productions to law enforcement agencies for use in production to new subpoena for documents	1.90	665.00
6/14/19	CJS	Telephone conference with Jenner & Block team regarding response to subpoena	.60	210.00
6/14/19	RLS	Telephone conference with Christopher J. Schneider, Gayle Littleton and Christine Bowman regarding subpoena	.60	210.00
6/18/19	HAR	Update document production records regarding Indiana Attorney General production	.30	58.50
6/20/19	ACC	Telephone conference with James	.30	64.50

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Date	Code	Description	Rate	Amount
		Casteel regarding previous productions to law enforcement and response to subpoena		
6/20/19	ACC	Email to Jenner & Block regarding response to subpoena	.20	43.00
6/20/19	CJS	Analysis of recent proposed legislation	.20	70.00
6/20/19	CJS	Correspondence with Gibson Dunn regarding congressional update	.20	70.00
6/20/19	CJS	Telephone conference with Jenner & Block team and Rebecca L. Strauss regarding subpoena response	.60	210.00
6/21/19	JWC	Create saved search of all documents produced to the Indiana Attorney General that have been identified as hard copy	.60	90.00
6/24/19	JWC	Search for documents for Indiana Attorney General production in Relativity	.40	60.00
6/24/19	JWC	Perform conflict checks of documents for Indiana Attorney General production in Relativity	1.20	180.00
6/24/19	JWC	Prepare documents for Indiana Attorney General production in Relativity	.60	90.00
6/24/19	JWC	Send Indiana Attorney General production set for running in Relativity	.20	30.00
6/24/19	ACC	Coordinate claw back of certain privileged documents from the Indiana attorney general	1.50	322.50

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6/24/19	ACC	Communications with James W. Casteel regarding clawback of privileged documents from certain law enforcement agencies	.20	43.00
6/25/19	ACC	Telephone conference with James W. Casteel regarding claw back of documents for law enforcement agencies	.20	43.00
6/26/19	JWC	Review information in production tracker for productions that meet specific criteria	.80	120.00
6/26/19	JWC	Review group of specific documents that are possibly to be included in a claw back production	1.20	180.00
6/26/19	ACC	Coordinate claw back of documents from the Indiana attorney general	.40	86.00
6/28/19	JWC	Investigate specific documents that may have technical issues that were produced to a specific party	1.60	240.00
6/28/19	JWC	Review possible documents to be clawed back in Relativity	1.60	240.00
6/28/19	ACC	Draft cover letter to the Indiana Attorney General regarding clawback of privileged documents	1.00	215.00
TOTAL HOURS			44.80	
Total Services				11,082.50

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Attorney Summary

		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Casteel, James W	Lit Support Proj Mg	14.60	150.00	2,190.00
Schneider, Christopher J.	Member	2.40	350.00	840.00
Strauss, Rebecca L.	Member	15.70	350.00	5,495.00
Krieger, Carol M.	Paralegal	1.50	195.00	292.50
Root, Heather A.	Paralegal	.70	195.00	136.50
Contreras-Caballero, Alej	Associate	9.90	215.00	2,128.50
		44.80		11,082.50

Total This Invoice

11,082.50

Invoices Due Upon Receipt

PO Box 306
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USA Gymnastics
Accounts Payable
130 E Washington Street
Suite 700
Indianapolis, IN 46204

Re: Ropes & Gray and Other Investigations

REMITTANCE ADVICE

For Legal Services Rendered through June 30, 2019

Total Services 11,082.50

Total This Invoice 11,082.50

Invoice Is Due Upon Receipt

Our remit address is: PO Box 306, Grand Rapids, MI. 49501-0306

Payments: If paying by check please return the remittance advice or write your invoice number(s) on your check. You may also pay by credit or debit card through our online payment portal www.millerjohnson.com/onlinepayments. If you have any questions regarding this invoice or you wish to set up ACH payments please call 616-831-1700 and ask for the collections department.

EXHIBIT A(2)

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Indianapolis, IN 46204

Re: CJS Chief Legal Officer

For Legal Services Rendered through June 30, 2019

6/01/19	CJS	Correspondence with Matthew M. O'Rourke regarding contractor agreement	.20	70.00
6/01/19	CJS	Revise member club indemnification agreement	2.10	735.00
6/01/19	CJS	Correspondence with Cathy Allen regarding FMLA issue	.10	35.00
6/02/19	MVB	Prepare short summary of guiding principles for privacy and security issues and email to Christopher J. Schneider and Rebecca L. Strauss soliciting feedback	.80	320.00
6/02/19	CJS	Correspondence with Ivana Hong regarding Athletes' Council matters	.10	35.00
6/03/19	MVB	Continue to prepare revisions to written summary of general principles for privacy and security by health care providers for Christopher J. Schneider and Rebecca L. Strauss	1.30	520.00
6/03/19	MMO	Correspond with Ryan Ward regarding Acrobatic High-Performance Administrator independent contractor agreement	.20	55.00
6/03/19	MMO	Draft changes to independent contractor agreement for high performance acrobatic administrator	.30	82.50

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6/03/19	MDP	Draft USAG Membership form for junior instructors	.20	39.00
6/03/19	MDP	Draft USAG Membership form for adult instructors	.20	39.00
6/03/19	MDP	Draft USAG Membership form for junior professionals	.20	39.00
6/03/19	MDP	Draft USAG Membership form for professionals	.20	39.00
6/03/19	MDP	Draft USAG Membership form for member clubs	1.10	214.50
6/03/19	CJS	Correspondence with Bernadette Barron regarding audited financial statements	.10	35.00
6/03/19	CJS	Correspondence with Kimberly Till regarding governance matters	.20	70.00
6/03/19	CJS	Correspondence with Athletes' Council regarding elections	.10	35.00
6/03/19	CJS	Review and revise memorandum to medical providers regarding records management	.60	210.00
6/03/19	CJS	Revise proposed communications statement to reflect legal advice	.10	35.00
6/03/19	CJS	Prepare for and participate in Athletes' Council telephonic meeting	.40	140.00
6/03/19	CJS	Correspondence with Board of Directors regarding Athletes' Council election	.20	70.00
6/03/19	CJS	Correspondence with Annie Heffernon regarding athlete reps	.10	35.00
6/03/19	CJS	Revise camp and event registration	.70	245.00

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		form		
6/03/19	CJS	Review media agreement and participation agreement for certain events	1.20	420.00
6/04/19	PME	Analysis of employee eligibility for FMLA leave [REDACTED]	.90	270.00
6/04/19	PME	Discussion with Cathy Allen regarding employee's eligibility for FMLA leave	.10	30.00
6/04/19	MMO	Correspond with Ryan Ward regarding changes to independent contractor agreement	.20	55.00
6/04/19	MMO	Review and revise independent contractor agreement	.10	27.50
6/04/19	MMO	Begin to draft independent contractor agreement for Interim Medical Administrator	.20	55.00
6/04/19	CJS	Correspondence with David Kruse regarding licensure issue	.10	35.00
6/04/19	CJS	Correspondence with Alison Alfers regarding advice for medical providers on privacy matters	.10	35.00
6/04/19	CJS	Correspondence with David Kruse regarding licensure issue	.10	35.00
6/04/19	CJS	Revise letter to coach regarding SafeSport matter	.40	140.00
6/04/19	CJS	Revise new version of parental consent agreement for clubs	.20	70.00
6/04/19	CJS	Correspondence from Dennis McIntyre	.10	35.00

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		regarding SafeSport matter		
6/04/19	CJS	Conference with club owner regarding SafeSport matter	.50	175.00
6/04/19	CJS	Correspondence with Cathy Allen regarding insurance issue	.10	35.00
6/04/19	CJS	Participate in senior leadership team meeting	1.20	420.00
6/04/19	CJS	Correspondence with Leslie King regarding revisions to SafeSport policy	.10	35.00
6/04/19	CJS	Correspondence with Coverage Counsel regarding indemnity and coverage matters	.10	35.00
6/04/19	CJS	Correspondence with Matthew M. O'Rourke and Ryan Ward regarding contractor	.20	70.00
6/04/19	CJS	Correspondence with Jeff Smith regarding new vendor contract	.10	35.00
6/04/19	MLT	Research sensitivity training information for athlete meetings	1.30	520.00
6/04/19	MLT	Communications with VP of Men's Program regarding agenda for meetings with [REDACTED]	1.50	600.00
6/04/19	MLT	Additional communications with VP of Men's Programming regarding personnel matter	.50	200.00
6/04/19	SKW	Office conference with Patrick M. Edsenga regarding strategy for FMLA matter	.30	132.00

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6/05/19	ACC	Search Relativity and USAG membership database for files related to a certain individual [REDACTED] and email to Mark Busby regarding same	.20	43.00
6/05/19	MMO	Draft addendum to master services agreement for Interim Medical Administrator	1.60	440.00
6/05/19	MDP	Office conference with Christopher J. Schneider discussing new Main Event Agreement with USA Gymnastics	.30	58.50
6/05/19	MDP	Update from Christopher J. Schneider [REDACTED]	.10	19.50
6/05/19	MDP	Draft Master Services Agreement between USA Gymnastics and Main Event Merchandising Group, LLC	2.40	468.00
6/05/19	CJS	Correspondence from bankruptcy counsel regarding National Gymnastics Foundation matters	.10	35.00
6/05/19	CJS	Office conference with Michael D. Penny regarding new vendor contract	.30	105.00
6/05/19	CJS	Conference with Leslie King and Emily Zorn regarding revisions to SafeSport policy and procedures	.30	105.00
6/05/19	CJS	Telephone conference with Dennis McIntyre regarding coaching issue	.20	70.00
6/05/19	CJS	Follow-up conference with Jeff Smith regarding new vendor agreement	.20	70.00
6/05/19	CJS	Telephone conference with Alison Alfors regarding records management	.30	105.00

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matters

6/05/19	CJS	Revise summary of privacy principles for medical providers	1.00	350.00
6/05/19	CJS	Telephone conference with Li Li Leung regarding [REDACTED]	.20	70.00
6/05/19	CJS	Telephone conference with Ryan Ward regarding contractor agreement	.20	70.00
6/05/19	CJS	Draft correspondence to insurer regarding follow-up information from renewal meeting	.50	175.00
6/05/19	CJS	Communication with Mark Busby regarding bylaw issue	.10	35.00
6/05/19	CJS	Correspondence with coverage counsel regarding coverage for medical personnel	.20	70.00
6/05/19	CJS	Correspondence with coverage counsel regarding coverage and bylaw matter	.10	35.00
6/05/19	CJS	Correspondence with Leslie King regarding legal advice on proposed communication statement	.10	35.00
6/05/19	CJS	Correspondence with Texas counsel regarding invoices	.10	35.00
6/05/19	CJS	Correspondence with Michael E. Stroster regarding visa matter	.10	35.00
6/06/19	ACC	Per Mark Busby request, review documents related to [REDACTED]	.70	150.50
6/06/19	MDP	Review and revise Master Services Agreement between USA Gymnastics and	.80	156.00

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Main Event pursuant to Christopher J.
Schneider comments

6/06/19	CJS	Revise communications statement to reflect legal advice	.10	35.00
6/06/19	CJS	Correspondence with opposing counsel regarding personnel matter	.10	35.00
6/06/19	CJS	Correspondence with legal team regarding revised organizational chart	.10	35.00
6/06/19	CJS	Revise proposed organizational chart	.40	140.00
6/06/19	CJS	Revise new vendor contract	1.10	385.00
6/06/19	CJS	Conferences with Annie Heffernon and Phil Hilder regarding [REDACTED]	.30	105.00
6/06/19	CJS	Telephone conference with opposing counsel regarding vendor contract	.20	70.00
6/06/19	CJS	Telephone conference with Kathryn Carson regarding status of legal matters and strategy	.50	175.00
6/06/19	CJS	Analysis of Pan American Games Staff Selection Procedures	.20	70.00
6/06/19	CJS	Telephone conference with [REDACTED] regarding personnel matter	.20	70.00
6/06/19	CJS	Revise contractor agreement	.30	105.00
6/06/19	CJS	Telephone conference with auditors regarding information needed for audited financial statements	.60	210.00
6/06/19	CJS	Correspondence with Matthew M. O'Rourke regarding additional	.10	35.00

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contractor agreement				
6/06/19	CJS	Additional revisions to new vendor contract	.30	105.00
6/06/19	CJS	Revise response to media inquiry to reflect legal advice	.70	245.00
6/06/19	CJS	Telephone conference with Leslie King regarding legal advice on media response	.30	105.00
6/06/19	CJS	Follow-up correspondence with insurer regarding information requested for renewal	.10	35.00
6/06/19	CJS	Additional revisions to new vendor agreement	.50	175.00
6/06/19	CJS	Revise engagement letter with recruiting firm	.40	140.00
6/06/19	CJS	Correspondence with Mark Busby regarding SafeSport matter	.20	70.00
6/06/19	MLT	Telephone conference with [REDACTED] regarding personnel matter	1.00	400.00
6/06/19	MLT	Work on sensitivity training materials for personnel matter	1.70	680.00
6/07/19	ACC	Per Mark Busby request, review documents related to [REDACTED] and draft email memorandum to Busby regarding same	1.50	322.50
6/07/19	MMO	Draft Addendum to Master Services Agreement for Dr. David Kruse	1.60	440.00
6/07/19	MMO	Correspond with Christopher J. Schneider regarding Addendum to Master	.20	55.00

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Services Agreement for Dr. David Kruse

6/07/19	MDP	Revise Master Services Agreement between USA Gymnastics and Main Event	.40	78.00
6/07/19	CJS	Correspondence with Mark Busby regarding SafeSport matter	.20	70.00
6/07/19	CJS	Correspondence with Leslie King regarding legal advice on communications statement	.10	35.00
6/07/19	CJS	Revise contractor agreement	.40	140.00
6/07/19	CJS	Review revised format for SafeSport procedures	.20	70.00
6/07/19	CJS	Telephone conference with Kathryn Carson and Li Li Leung regarding potential meeting with constituents	.40	140.00
6/07/19	CJS	Draft response letter to various members regarding request for a meeting	.70	245.00
6/07/19	CJS	Correspondence with Jeff Smith regarding new vendor contract	.10	35.00
6/07/19	CJS	Revise new vendor contract	.20	70.00
6/07/19	CJS	Telephone conference with Leslie King regarding legal advice on proposed media response	.50	175.00
6/07/19	CJS	Telephone conference with Li Li Leung regarding legal updates	.50	175.00
6/07/19	CJS	Communications with Mark Busby, Erica Koven, and Li Li Leung regarding	.50	175.00

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6/07/19	CJS	Draft correspondence to opposing counsel [REDACTED]	.40	140.00
6/07/19	CJS	Telephone conference with opposing counsel regarding [REDACTED]	.20	70.00
6/07/19	CJS	Revise contract with vendor	.30	105.00
6/07/19	MLT	Work on investigation	4.80	1,920.00
6/09/19	CJS	Correspondence with Kathryn Carson and Li Li Leung regarding revisions to SafeSport policy	.10	35.00
6/09/19	CJS	Correspondence with Mark Busby regarding SafeSport matter	.10	35.00
6/10/19	CJS	To Indianapolis for CLO work	4.40	1,540.00
6/10/19	CJS	CLO work on-site at USA Gymnastics	3.40	1,190.00
6/10/19	MLT	Work on sensitivity training materials regarding personnel matter	1.90	760.00
6/11/19	MDP	Review old Member Club form and new word Member form for any missing language	.50	97.50
6/11/19	CJS	Attend staff meeting regarding SafeSport policy	1.00	350.00
6/11/19	CJS	Attend senior leadership team meeting	1.80	630.00
6/11/19	CJS	CLO work on site at USA Gymnastics	6.30	2,205.00
6/11/19	CJS	Return to Grand Rapids from Indianapolis	4.30	1,505.00
6/11/19	MLT	Finalize sensitivity training	.90	360.00

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materials

6/11/19	MLT	Communication with VP of Men's Programming regarding sensitivity training	.30	120.00
6/12/19	MMO	Begin to draft template offer letter	.20	55.00
6/12/19	MDP	Review and revise USA Gymnastics Member Club form pursuant to Christopher J. Schneider comments	2.20	429.00
6/12/19	CJS	Continued revisions to membership applications for 2019-2020 season	2.20	770.00
6/12/19	CJS	Revise new language for SafeSport policy	.20	70.00
6/12/19	CJS	Correspondence with Matthew M. O'Rourke regarding template offer letter	.20	70.00
6/12/19	CJS	Revise contract for 2020 Women's Collegiate National Championships	.80	280.00
6/12/19	CJS	Telephone conference with Rebecca L. Strauss regarding mediation brief and other open issues	.20	70.00
6/12/19	CJS	Additional revisions to membership application forms	.40	140.00
6/12/19	CJS	Revise proposed communications response to reflect legal advice	.30	105.00
6/12/19	CJS	Telephone conference with Leslie King regarding legal advice on communications statement	.10	35.00
6/12/19	MLT	Communications with VP of men's programming regarding athlete meetings	.20	80.00

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6/13/19	ACC	Review and redact exhibits to professional fee application	1.30	279.50
6/13/19	MDP	Prepare USA Gymnastics Board of Directors Meeting Minute notes	.20	39.00
6/13/19	MDP	USA Gymnastics Board of Directors telephone conference call	1.60	312.00
6/13/19	CJS	Review of Jenner & Block invoices for April and May	.10	35.00
6/13/19	CJS	Analysis of coverage memo from coverage counsel	.40	140.00
6/13/19	CJS	Correspondence with Aon regarding insurance coverage for subpoena response	.10	35.00
6/13/19	CJS	Correspondence with Erica Koven regarding revision to Member Club membership application	.10	35.00
6/13/19	CJS	Follow-up correspondence with Kathryn Carson, David Rudd, and Stefanie Korepin regarding insurance coverage memo	.10	35.00
6/13/19	CJS	Conference with Cornell regarding event contract	.20	70.00
6/13/19	CJS	Attend Board of Directors telephonic meeting	1.60	560.00
6/13/19	CJS	Correspondence with Mark Busby regarding SafeSport matter	.10	35.00
6/13/19	CJS	Correspondence with Krissy Klein regarding [REDACTED]	.10	35.00

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6/14/19	MMO	Draft offer letter template	1.90	522.50
6/14/19	CJS	Revise new offer letter template	.20	70.00
6/14/19	CJS	Provide legal advice on proposed communication statement, for Leslie King	.10	35.00
6/14/19	CJS	Revise contractor agreement	.20	70.00
6/14/19	CJS	Communication with Leslie King regarding legal advice on media statement	.10	35.00
6/14/19	MLT	Work on second agenda and training for sensitivity training for athlete	2.30	920.00
6/15/19	DAP	Work on fee petition	1.20	540.00
6/16/19	MDP	Review USA Gymnastics Policy on Confidential Information including Policy Acknowledgement	1.00	195.00
6/16/19	CJS	Correspondence from Mark Busby regarding SafeSport matters	.10	35.00
6/17/19	ACC	Work on exhibits to professional fee application	.50	107.50
6/17/19	ACC	Per Mark Busby request, review documents in Relativity related [REDACTED]	.50	107.50
6/17/19	ACC	Draft email to Mark Busby regarding documents in Relativity regarding [REDACTED]	.10	21.50
6/17/19	MDP	Review and provide comments on USA Gymnastics Policy on Confidential Information	.70	136.50

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6/17/19	CJS	Draft confidentiality agreement for SafeSport Committee	.70	245.00
6/17/19	CJS	Revise SafeSport Procedures	3.00	1,050.00
6/17/19	CJS	Telephone conference with Li Li Leung and Stefanie Korepin regarding Trampoline & Tumbling matter	.60	210.00
6/17/19	CJS	Participate in SafeSport department meeting by telephone	1.10	385.00
6/17/19	CJS	Review proposed language change to SafeSport policy	.10	35.00
6/17/19	MLT	Work on investigation report	7.20	2,880.00
6/18/19	CJS	To Indianapolis for CLO work	4.30	1,505.00
6/18/19	CJS	CLO work on-site at USA Gymnastics	4.60	1,610.00
6/18/19	CJS	Initial review of USOC compliance checklist report	.10	35.00
6/18/19	DET	Telephonic conference with Christopher J. Schneider regarding statement drafting for excess insurers	.20	55.00
6/18/19	DET	Review May 16, 2019 powerpoint presentation to insurers in preparation of USAG statement to excess insurers	1.10	302.50
6/18/19	DET	Draft notes and outline from background materials in preparation of statement to excess insurers	1.50	412.50
6/19/19	CJS	CLO work on site at USAG	6.30	2,205.00
6/19/19	CJS	Return to Grand Rapids from Indianapolis	4.30	1,505.00

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6/19/19	DET	Compare Jenner & Block work product against claimant forms submitted in bankruptcy in analysis/quality control of Jenner & Block work product	2.40	660.00
6/19/19	DET	Review background materials in preparation of statement to USAG excess insurers	1.50	412.50
6/19/19	DET	Draft portion of statement to USAG excess insurers	1.30	357.50
6/20/19	CJS	Analysis of memo regarding Trampoline & Tumbling matter	.40	140.00
6/20/19	CJS	Telephone conference with Mark Busby regarding Trampoline & Tumbling matter	.80	280.00
6/20/19	CJS	Participate in exit interview for [REDACTED]	.30	105.00
6/20/19	CJS	Correspondence with USOC regarding annual compliance checklist	.10	35.00
6/20/19	CJS	Revise new draft of SafeSport procedures	2.60	910.00
6/20/19	CJS	Communications with Bernadette Barron and NTS regarding contract matter	.20	70.00
6/20/19	CJS	Analysis of personnel issue	.50	175.00
6/20/19	CJS	Revise proposed media statement to reflect legal advice	.10	35.00
6/20/19	CJS	Revise legal update presentation for insurance renewals	.50	175.00
6/20/19	CJS	Communication with Ryan Ward regarding [REDACTED]	.50	175.00

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6/20/19	CJS	Correspondence with Li Li Leung and bankruptcy counsel regarding contract matter	.10	35.00
6/20/19	CJS	Correspondence with Mary McDaniel regarding visa matter	.10	35.00
6/20/19	DET	Complete draft USAG statement to excess insurers	1.90	522.50
6/20/19	DET	Email communication and review Christopher J. Schneider notes on statement to excess insurers	.80	220.00
6/21/19	JLC	Review SafeSport policy for USOC approval	.50	50.00
6/21/19	ACC	Per Mark Busby request, review files in Relativity related to three individuals [REDACTED]	1.80	387.00
6/21/19	ACC	Draft email memorandum to Mark Busby regarding files in Relativity related to three individuals [REDACTED]	.20	43.00
6/21/19	ACC	Review and revise exhibits to professional fee application	.60	129.00
6/21/19	MDP	Office conference with Christopher J. Schneider discussing Trampoline & Tumbling request for proposals	.30	58.50
6/21/19	CJS	Revise SafeSport procedures	.40	140.00
6/21/19	CJS	Communications with Mark Busby regarding SafeSport matter	.30	105.00
6/21/19	CJS	Revise booklet for insurers regarding	1.00	350.00

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renewal meeting

6/21/19	CJS	Additional revisions to SafeSport procedures	.50	175.00
6/21/19	CJS	Correspondence with Kathryn Carson, Kimberly Till, and David Holcomb regarding [REDACTED]	.10	35.00
6/21/19	CJS	Analysis of new SafeSport policy in connection with USOC compliance checklist	.30	105.00
6/21/19	CJS	Communications with Stefanie Korepin and coverage counsel regarding coverage for independent observer on selection committee	.20	70.00
6/21/19	CJS	Correspondence with Li Li Leung and Stefanie Korepin regarding notice to certain creditors	.30	105.00
6/21/19	CJS	Conference call with USOC regarding annual compliance checklist	.60	210.00
6/21/19	CJS	Communications with bankruptcy counsel and Omni regarding notice issue	.40	140.00
6/21/19	CJS	Revise second amendment to NBC contract	1.20	420.00
6/21/19	CJS	Correspondence with Aon regarding new SafeSport policy	.10	35.00
6/21/19	MLT	Work on investigation report	9.00	3,600.00
6/22/19	CJS	Analysis of [REDACTED]	.50	175.00
6/22/19	CJS	Correspondence with Mark Busby and Leslie King regarding SafeSport procedures	.10	35.00

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6/24/19	AMC	Preliminary review of University of Utah Event Agreement	.30	87.00
6/24/19	DAP	Exchange emails with co-counsel regarding employee issue	.30	135.00
6/24/19	CJS	Final revisions to booklet for insurance renewal meetings	.30	105.00
6/24/19	CJS	Revise glossary terms for SafeSport procedures	.60	210.00
6/24/19	CJS	Analysis of National Team Agreement	.70	245.00
6/24/19	CJS	Communications with Mark Busby regarding code of ethical conduct matter and SafeSport glossary	.30	105.00
6/24/19	CJS	Participate in senior leadership team meeting by telephone	.50	175.00
6/24/19	CJS	Correspondence with Mary L. Tabin regarding personnel issue	.20	70.00
6/24/19	CJS	Telephone conference with Nikki Warren regarding insurance renewal	.20	70.00
6/24/19	CJS	Telephone conference with RT Specialty regarding insurance renewal	.20	70.00
6/24/19	CJS	Correspondence with Erica Koven regarding legal advice on issue under new SafeSport policy	.20	70.00
6/24/19	CJS	Office conference with Michael D. Penny regarding revisions to National Team Agreement	.10	35.00
6/24/19	CJS	Correspondence with Li Li Leung regarding amendment to NBC agreement	.10	35.00

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6/24/19	CJS	Revise summary of benefits for national team	.20	70.00
6/24/19	CJS	Telephone conference with Erica Koven and Shelba Waldron regarding SafeSport policy	.40	140.00
6/24/19	CJS	Revise proposed correspondence to insurers regarding renewal	.10	35.00
6/24/19	CJS	Telephone conference with Mark Busby regarding trampoline and tumbling matter	.10	35.00
6/24/19	CJS	Telephone conference with Leslie King regarding legal advice on proposed communications response	.10	35.00
6/24/19	MLT	Communication with Christopher J. Schneider regarding personnel matter	.30	120.00
6/24/19	MLT	Communications with employee regarding personnel matter	.50	200.00
6/24/19	MLT	Work on investigation report	5.60	2,240.00
6/24/19	DET	Review [REDACTED] Professional Responsibility Office letter	.10	27.50
6/25/19	CJS	Travel to London, UK for insurance renewal meetings [Note: Actual travel time was ~30 hours over 6/25 and 6/26, due to excessive airline delays. Time billed reflects a 50% discount]	15.00	5,250.00
6/25/19	MLT	Additional communication with employee regarding personnel matter	.40	160.00
6/25/19	MLT	Draft and revise power point presentation and training for athlete	4.20	1,680.00

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regarding personnel matter

6/25/19	MLT	Research regarding training presentation for athlete regarding presentation issue	3.70	1,480.00
6/26/19	JLC	Review terms in SafeSport policy	1.00	100.00
6/26/19	PME	Draft athlete social media policy	.90	270.00
6/26/19	MMO	Draft independent contractor agreement for new contractor	.90	247.50
6/26/19	MDP	Continue review and revising USA Gymnastics National Team Agreement and send to Christopher J. Schneider	3.80	741.00
6/26/19	CJS	Correspondence with Ryan Ward regarding contract matter	.20	70.00
6/26/19	CJS	Review revisions to National Team Agreement	.50	175.00
6/26/19	MLT	Prepare for telephone conference with employee regarding [REDACTED]	.60	240.00
6/26/19	MLT	Telephone conference with employee regarding [REDACTED]	.50	200.00
6/26/19	MLT	Communication with Christopher J Schneider regarding [REDACTED]	.90	360.00
6/26/19	MLT	Draft proposed correspondence to coach regarding [REDACTED]	.60	240.00
6/26/19	MLT	Draft outline of issues, topics and questions to investigate regarding personnel matter	1.70	680.00

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6/27/19	MMO	Review and revise independent contractor agreement	.50	137.50
6/27/19	MMO	Correspond with Stefanie Korepin regarding independent contractor agreement	.10	27.50
6/27/19	MDP	Review and revise USA Gymnastics bid proposal for Selection Events	.70	136.50
6/27/19	CJS	Prepare for meeting with insurers regarding renewal, including preparation meeting with Li Li Leung	1.50	525.00
6/27/19	CJS	Meetings and dinner with insurers in London for renewals	9.80	3,430.00
6/27/19	MLT	Work on investigation report	7.60	3,040.00
6/28/19	MDP	Draft Selection Event form Agreement for USA Gymnastics	1.70	331.50
6/28/19	CJS	Return to United States from London meeting on insurance renewal	15.50	5,425.00
6/28/19	MLT	Review additional information provided by employee regarding personnel matter	3.20	1,280.00
6/29/19	MDP	Review and revise Selection Event agreement for USA Gymnastics and send to Christopher J. Schneider	1.30	253.50
6/30/19	CJS	Correspondence with Steve Legendre regarding athletes council	.10	35.00
TOTAL HOURS			254.50	
Total Services				86,495.50

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Attorney Summary

		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Bauman, Mary V.	Member	2.10	400.00	840.00
Portinga, D. Andrew	Member	1.50	450.00	675.00
Schneider, Christopher J.	Member	138.40	350.00	48,440.00
Tabin, Mary L.	Member	62.40	400.00	24,960.00
Willey, Sarah K.	Member	.30	440.00	132.00
Carson, Anne Marie	Associate	.30	290.00	87.00
Edsenga, Patrick M.	Member	1.90	300.00	570.00
O'Rourke, Matthew M.	Associate	8.00	275.00	2,200.00
Penny, Michael D	Associate	19.90	195.00	3,880.50
Carlton, Jacob L.	Clerk	1.50	100.00	150.00
Contreras-Caballero, Alej	Associate	7.40	215.00	1,591.00
Truesdell, Daniel E.	Associate	10.80	275.00	2,970.00
		254.50		86,495.50

Expenses

Computer Assisted Research	1,586.00
CHRISTOPHER J. SCHNE Check # - 9990	307.40
Mileage	
Reproductions 2 pages	1.00
CHRISTOPHER J. SCHNE Check # - 9990	6.70
Taxi	
CHRISTOPHER J. SCHNE Check # - 9990	8.18
Meals	
CHRISTOPHER J. SCHNE Check # - 9990	83.87
Meals	
CHRISTOPHER J. SCHNE Check # - 9990	3,043.73
Airplane Tickets	
CHRISTOPHER J. SCHNE Check # - 9990	8.44
CHRISTOPHER J. SCHNE Check # - 9990	13.03
Reproductions 4 pages	.60
Reproductions 2 pages	.30
Reproductions 3 pages	.45
Reproductions 2 pages	.30

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Expenses

Reproductions 2 pages	.30
Reproductions 3 pages	.45
Reproductions 3 pages	.45
CHRISTOPHER J. SCHNE Check # - 9990	732.00
Airplane Tickets	
CHRISTOPHER J. SCHNE Check # - 9990	307.40
Mileage	
CHRISTOPHER J. SCHNE Check # - 9990	4.28
Meals	
CHRISTOPHER J. SCHNE Check # - 9990	8.18
Meals	
CHRISTOPHER J. SCHNE Check # - 9990	5.00
Meals	
Reproductions 1 pages	.15
Reproductions 19 pages	2.85
Reproductions 8 pages	1.20
Reproductions 2 pages	.30
Reproductions 1 pages	.15
Reproductions 3 pages	.45
Reproductions 10 pages	1.50
Reproductions 10 pages	1.50
Reproductions 38 pages	5.70
Computer Assisted Research	260.00
Reproductions 9 pages	4.50
Reproductions 54 pages	8.10
Reproductions 1 pages	.50
Reproductions 9 pages	1.35
Reproductions 1 pages	.15
CHRISTOPHER J. SCHNE Check # - 9990	4.29
Meals	
CHRISTOPHER J. SCHNE Check # - 9990	16.28
Meals	
CHRISTOPHER J. SCHNE Check # - 9990	50.09
Meals	
CHRISTOPHER J. SCHNE Check # - 9990	13.99
Outside Internet Charges	
CHRISTOPHER J. SCHNE Check # - 9990	28.13
Taxi	

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Expenses

CHRISTOPHER J. SCHNE Check # - 9990	44.45
Taxi	
CHRISTOPHER J. SCHNE Check # - 9990	173.73
Meals	
CHRISTOPHER J. SCHNE Check # - 9990	6.28
Meals	
CHRISTOPHER J. SCHNE Check # - 9990	3.79
Meals	
CHRISTOPHER J. SCHNE Check # - 9990	114.30
Taxi	
CHRISTOPHER J. SCHNE Check # - 9990	124.83
Taxi	
CHRISTOPHER J. SCHNE Check # - 9990	19.99
Travel Expense-In flight Wi-Fi	
CHRISTOPHER J. SCHNE Check # - 9990	1,243.16
Travel Expense-Hotel	
Total Expenses	8,249.77
Total This Invoice	94,745.27

Invoices Due Upon Receipt

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OUTSTANDING ACCOUNTS RECEIVABLE

INVOICE NUMBER	DATE	INVOICE AMOUNT	PAYMENTS AGAINST INVOICE	INVOICE BALANCE
1690179	2/14/19	73,608.76	59,124.96	14,483.80
1691021	3/18/19	64,476.01	51,679.21	12,796.80
1694037	4/17/19	81,436.49	65,321.49	16,115.00
1696899	5/21/19	73,299.57	59,053.17	14,246.40
1699811	6/13/19	83,847.71	.00	83,847.71
		Prior Unpaid Balance		141,489.71
		Total Amount Due		236,234.98

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USA Gymnastics
Accounts Payable
130 E Washington Street
Suite 700
Indianapolis, IN 46204

Re: CJS Chief Legal Officer

REMITTANCE ADVICE

For Legal Services Rendered through June 30, 2019

Total Services 86,495.50

Total Expenses 8,249.77

Total This Invoice 94,745.27

Invoice Is Due Upon Receipt

Our remit address is: PO Box 306, Grand Rapids, MI. 49501-0306

Payments: If paying by check please return the remittance advice or write your invoice number(s) on your check. You may also pay by credit or debit card through our online payment portal www.millerjohnson.com/onlinepayments. If you have any questions regarding this invoice or you wish to set up ACH payments please call 616-831-1700 and ask for the collections department.